

Mallory Bland (3334)

From: Mallory Bland (3334) <Mallory.Bland@phelps.com>
Sent: Wednesday, March 3, 2021 3:42 PM
To: 'Garret T. Estes'; John K. Perry
Cc: Todd Butler (3366)
Subject: RE: Welch v. City of Hernando, et al

Garret,

Just to follow up after speaking with Todd, we remain willing to provide the information listed in the first email, and we will supplement that complaint, if you are willing to stipulate that the dispute regarding our written discovery responses is resolved. If not, we will just wait and respond to any motion filed. Regarding Harris' 10+ year old misdemeanor, if you can provide some authority as to how it is discoverable, we are willing to reevaluate our position on that one. Also, regarding the log requested, none of the documents are being withheld based on privilege, so the Rules do not require a log.

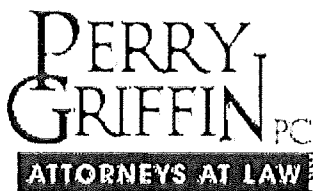
Mallory

From: Garret T. Estes <GE@perrygriffin.com>
Sent: Wednesday, March 3, 2021 1:21 PM
To: Mallory Bland (3334) <Mallory.Bland@phelps.com>; Todd Butler (3366) <Todd.Butler@phelps.com>
Subject: RE: Welch v. City of Hernando, et al

Mallory,

I have a 2:00 appointment, but I should be free at 3:00 if you're free.

Garret Estes
Attorney



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From: Mallory Bland (3334) <Mallory.Bland@phelps.com>
Sent: Wednesday, March 3, 2021 1:18 PM
To: Todd Butler (3366) <Todd.Butler@phelps.com>; Garret T. Estes <GE@perrygriffin.com>
Subject: RE: Welch v. City of Hernando, et al

Garret,

I can talk this afternoon if we need to. 2:30 ok?

Mallory

From: Todd Butler (3366)
Sent: Wednesday, March 3, 2021 12:55 PM
To: 'Garret T. Estes' <GE@perrygriffin.com>; Mallory Bland (3334) <Mallory.Bland@phelps.com>
Subject: RE: Welch v. City of Hernando, et al

Garret – I'm out for depositions the next couple of days, but Mallory may be able to discuss. I anticipate our position remaining the same as set out in our original proposal. If there is anything in particular you'd like us to consider, let us know. Thanks.

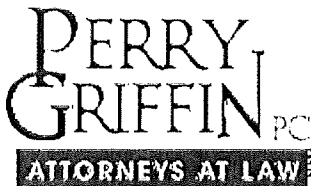
From: Garret T. Estes <GE@perrygriffin.com>
Sent: Wednesday, March 3, 2021 12:21 PM
To: Mallory Bland (3334) <Mallory.Bland@phelps.com>; Todd Butler (3366) <Todd.Butler@phelps.com>
Subject: Welch v. City of Hernando, et al

Good afternoon Mallory and Todd:

I hope this email finds you both well. Are either or both of you available to talk this afternoon to try and resolve our discovery issues?

Best regards,

Garret Estes
Attorney



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